



August 27, 2014

Mr. C. Mel Lytle
Stockton RWCF
2500 Navy Drive
Stockton, CA 95206

**Re: Notice of Minor Title V Permit Modification
District Facility # N-811
Project # N-1142973**

Dear Mr. Lytle:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued N-811-13-5 into the Title V operating permit. This modification is to upgrade the phase I vapor recovery system from two-point to Morrison Brothers EVR (VR-402) for the existing non-retail motor vehicle gasoline dispensing operation.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-811-13-5, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

Title V APPLICATION REVIEW

Minor Modification

Date:

Facility Number: N-811
Facility Name: Stockton RWCF
Mailing Address: 2500 Navy Drive
Stockton, CA 95206

Contact Name: C. Mel Lytle
Phone: (209) 937 – 8700
E-Mail: N/A

Responsible Official: C. Mel Lytle
Title: Director of Municipal Utilities

Processing Staff: Wai-Man So
Project Number: N-1142973

I. PROPOSAL

Stockton RWCF is proposing a Title V minor modification to incorporate the recently issued Authority to Construct (ATC) N-811-13-5 into the Title V operating permit. The applicant proposes to upgrade the phase I vapor recovery system from Two-Point to Morrison Brothers EVR (VR-402) for the existing non-retail motor vehicle gasoline dispensing operation.

The purpose of this document is to identify all applicable requirements, determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

This facility is located at 2500 Navy Drive in Stockton, California.

III. EQUIPMENT DESCRIPTION

GASOLINE DISPENSING OPERATION WITH ONE 2,000 GALLON CONVAULT ABOVEGROUND STORAGE TANK SERVED BY MORRISON BROTHERS EVR PHASE I VAPOR RECOVERY SYSTEM (VR-402-B), STANDING LOSS CONTROL (VR-301-E), AND 1 FUELING POINT WITH 1 GASOLINE DISPENSING NOZZLE SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-116-B)

IV. SCOPE OF EPA AND PUBLIC REVIEW

The proposed project is a Minor Modification to the Title V permit. Therefore, public review is not required.

V. APPLICABLE REQUIREMENTS

District Rule 2520 Federally Mandated Operating Permits (06/21/01)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Stockton RWCF has received an ATC N-811-13-5 to upgrade the phase I vapor recovery system from two-point to Morrison Brothers EVR (VR-402). A copy of this ATC is enclosed in Appendix II of this document.

Changes to PTO N-811-13-4:

Pursuant to engineering evaluation for project N-1141150, the inspection records of the District's Compliance Department indicated that the tank has always been equipped with a two-point Phase I vapor recovery system. Therefore, the equipment description of the Phase I vapor recovery system was corrected to reflect two-point instead of coaxial.

Changes to ATC N-811-13-5:

1. Condition # 1 states, "The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520]".

The applicant has submitted the application to modify the Title V permit on August 19, 2014. Therefore, the condition listed above has been removed from the permit.

2. Condition # 18 states, "The permittee shall perform and pass a Static Leak Test "Determination of Static Pressure Performance of Vapor Recovery Systems at Gasoline Dispensing Facilities with Aboveground Tanks" in accordance with the Executive Order specified in this permit for the Phase I Vapor Recovery System within 60 days after initial start-up and at least once every 12 months thereafter. [District Rules 4621 and 4622]".

Initial source testing was conducted and demonstrated compliance on June 5, 2014. Therefore, the condition listed above has been revised. The revised condition is listed as follows:

"Determination of Static Pressure Performance of Vapor Recovery Systems at Gasoline Dispensing Facilities with Aboveground Tanks" in accordance with the

Executive Order specified in this permit for the Phase I Vapor Recovery System at least once every 12 months. [District Rules 4621 and 4622]"

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, the proposed project modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs (Appendix V) ;
2. The source's suggested draft permit (Appendix I); and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used (Appendix IV).

Compliance is expected with this Rule.

APPENDICES

Appendix I: Proposed Modified Title V Operating Permit No. N-811-13-6

Appendix II: Authority to Construct N-811-13-5

Appendix III: Permit to Operate N-811-13-4

Appendix IV: Permit Application

Appendix V: Emissions Change

Appendix I

Proposed Modified Title V Operating Permit No. N-811-13-6

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-811-13-6

EXPIRATION DATE: 11/30/2018

EQUIPMENT DESCRIPTION:

GASOLINE DISPENSING OPERATION WITH ONE 2,000 GALLON CONVAULT ABOVEGROUND STORAGE TANK SERVED BY MORRISON BROTHERS EVR PHASE I VAPOR RECOVERY SYSTEM (VR-402-B), STANDING LOSS CONTROL (VR-301-E), AND 1 FUELING POINT WITH 1 GASOLINE DISPENSING NOZZLE SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-116-B)

PERMIT UNIT REQUIREMENTS

1. The Phase I, Phase II, and Standing Loss Control Vapor recovery systems shall be installed and maintained in accordance with the manufacturer specifications and the ARB Executive Orders specified in this permit, including applicable rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board that have been made conditions of the certification. [District Rules 4621 and 4622 and CH&SC 41950] Federally Enforceable Through Title V Permit
2. This gasoline storage and dispensing equipment shall not be used in retail sales, where gasoline dispensed by the unit is subject to payment of California sales tax on gasoline sales. [District Rule 4622] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. The storage container(s) shall be installed, maintained, and operated such that they are leak-free. [District Rule 4621] Federally Enforceable Through Title V Permit
5. The Phase I and Phase II vapor recovery systems and gasoline dispensing equipment shall be maintained without leaks as determined in accordance with the test method specified in this permit. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
6. A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration of total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with EPA Test Method 21. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
7. No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo container, which attest to the vapor integrity of the container. [District Rule 4621] Federally Enforceable Through Title V Permit
8. No person shall operate any ARB certified Phase II vapor recovery system or any portion thereof that has a major defect or an equipment defect that is identified in any applicable ARB Executive Order until the following conditions have been met: 1) the defect has been repaired, replaced, or adjusted as necessary to correct the defect; 2) the District has been notified, and the District has reinspected the system or authorized the system for use (such authorization shall not include the authority to operate the equipment prior to the correction of the defective components); and 3) all major defects, after repair, are duly entered into the Operations and Maintenance (O&M) manual. [District Rule 4622] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

9. Upon identification of any major defects, the permittee shall tag "Out-of-Order" all dispensing equipment for which vapor recovery has been impaired. Tagged equipment shall be rendered inoperable and the tag(s) shall not be removed until the defective equipment has been repaired, replaced, or adjusted, as necessary. In the case of defects identified by the District, tagged equipment shall be rendered inoperable, and the tag shall not be removed until the District has been notified of the repairs, and the District has either reinspected the system or authorized the tagged equipment for use. [District Rule 4622] Federally Enforceable Through Title V Permit
10. The permittee shall implement a periodic maintenance inspection program for the certified Phase II vapor recovery system consistent with the requirements of this permit. The program shall be documented in an operation and maintenance (O&M) manual and shall at a minimum contain the following information: 1) copies of all vapor recovery performance tests; 2) all applicable ARB Executive Orders, Approval Letters, and District Permits; 3) the manufacturer's specifications and instructions for installation, operation, repair, and maintenance required pursuant to ARB Certification Procedure CP-201, and any additional instruction provided by the manufacturer; 4) system and/or component testing requirements, including test schedules and passing criteria for each of the standard tests required by this permit (the owner/operator may include any non-ARB required diagnostic and other tests as part of the testing requirements), and 5) additional O&M instructions, if any, that are designed to ensure compliance with the applicable rules, regulations, ARB Executive Orders, and District permit conditions, including replacement schedules for failure or wear prone components. [District Rule 4622] Federally Enforceable Through Title V Permit
11. The permittee shall conduct periodic maintenance inspections based on the greatest monthly throughput of gasoline dispensed by the facility in the previous year as follows: A) less than 2,500 gallons - one day per month; B) 2,500 to less than 25,000 gallons - one day per week; or C) 25,000 gallons or greater - five days per week. All inspections shall be documented within the O & M Manual. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
12. Periodic maintenance inspections of the Phase I vapor recovery system shall include, at a minimum, verification that 1) the fill caps and vapor caps are not missing, damaged, or loose; 2) the fill cap gasket and vapor cap gaskets are not missing or damaged; 3) the fill adapter and vapor adapter are securely attached to the risers; 4) where applicable, the spring-loaded submerged fill tube seals properly against the coaxial tubing; 5) the dry break (poppet-valve) is not missing or damaged; and 6) the submerged fill tube is not missing or damaged. [District Rule 4621] Federally Enforceable Through Title V Permit
13. Periodic maintenance inspections of the Phase II vapor recovery system shall include, at a minimum, verification that 1) the following nozzle components are in place and in good condition as specified in ARB Executive Order as applicable: faceplate/facecone, bellows, latching device spring, vapor check valve, spout (proper diameter/vapor collection holes), insertion interlock mechanism, automatic shut-off mechanism, and hold open latch (unless prohibited by law or the local fire control authority); 2) the hoses are not torn, flattened or crimped; 3) the vapor path of the coaxial hoses associated with bellows equipped nozzles does not contain more than 100 ml of liquid if applicable; and 4) the vapor processing unit is functioning properly, for operations that are required to have or possess such a unit. [District Rule 4622] Federally Enforceable Through Title V Permit
14. In the event of a separation due to a drive off, the permittee shall, unless otherwise specified in the applicable ARB Executive Order, conduct a visual inspection of the affected equipment and either 1) perform qualified repairs on any damaged components and conduct applicable re-verification tests pursuant to the requirements of this permit, or 2) replace the affected nozzles, coaxial hoses, breakaway couplings, and any other damaged components with new or certified rebuilt components that are ARB certified. The activities shall be documented in accordance with the requirements of this permit before placing the affected equipment back in service. [District Rule 4622] Federally Enforceable Through Title V Permit
15. The gasoline throughput for this permit unit shall not exceed 657,000 gallons in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall conduct all periodic vapor recovery system performance tests specified in this permit, no more than 30 days before or after the required compliance testing date, unless otherwise required under the applicable ARB Executive Order. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

17. The permittee shall perform and pass a Static Leak Test "Determination of Static Pressure Performance of Vapor Recovery Systems at Gasoline Dispensing Facilities with Aboveground Tanks" in accordance with the Executive Order specified in this permit for the Phase I Vapor Recovery System at least once every 12 months. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
18. For certified Phase II vapor recovery systems with liquid removal devices, the permittee shall perform and pass an ARB TP-201.6C Liquid Removal Test whenever the liquid in the vapor path exceeds 100 ml of liquid, or as required by the applicable ARB Executive Order. The amount of liquid in the vapor path shall be measured by lowering the gasoline dispensing nozzle into a container until such time that no more liquid drains from the nozzle. The amount of liquid drained into the container shall be measured using a graduated cylinder or graduated beaker. The vapor path shall be inspected according to the monitoring frequency as determined by monthly gasoline throughput. [District Rule 4622] Federally Enforceable Through Title V Permit
19. A person conducting testing of, or repairs to, a certified vapor recovery system shall be in compliance with District Rule 1177 (Gasoline Dispensing Facility Tester Certification). [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
20. A person performing installation of, or maintenance on, a certified Phase I or Phase II vapor recovery system shall be certified by the ICC for Vapor Recovery System Installation and Repair, or work under the direct and personal supervision of an individual physically present at the work site who is certified. The ICC certification shall be renewed every 24 months. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
21. Proof of the ICC certification and all other certifications required by the Executive Order and installation and operation manual shall be made available onsite. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
22. The permittee shall notify the District at least 7 days prior to each performance test. The test results shall be submitted to the District no later than 30 days after the completion of each test. [District Rule 4621] Federally Enforceable Through Title V Permit
23. The permittee shall maintain a copy of all test results. The test results shall be dated and shall contain the name, address, and telephone number of the company responsible for system installation and testing. [District Rule 4622] Federally Enforceable Through Title V Permit
24. The permittee shall maintain on the premises a log of any repairs made to the certified Phase I or Phase II vapor recovery system. The repair log shall include the following: 1) date and time of each repair; 2) the name and applicable certification numbers of the person(s) who performed the repair, and if applicable, the name, address and phone number of the person's employer; 3) description of service performed; 4) each component that was repaired, serviced, or removed; 5) each component that was installed as replacement, if applicable; and 6) receipts or other documents for parts used in the repair and, if applicable, work orders which shall include the name and signature of the person responsible for performing the repairs. [District Rule 4622] Federally Enforceable Through Title V Permit
25. The O&M manual shall be kept at the dispensing operation and made available to any person who operates, inspects, maintains, repairs, or tests the equipment at the operation as well as to District personnel upon request. [District Rule 4622] Federally Enforceable Through Title V Permit
26. The permittee shall maintain monthly and annual gasoline throughput records. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
27. All records required by this permit shall be retained on-site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
28. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4621 (as amended December 19, 2013). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

Appendix II

Authority to Construct N-811-13-5



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: N-811-13-5

ISSUANCE DATE: 04/01/2014

LEGAL OWNER OR OPERATOR: STOCKTON RWCF
MAILING ADDRESS: 2500 NAVY DRIVE
STOCKTON, CA 95206

LOCATION: 2500 NAVY DR
STOCKTON, CA 95206

EQUIPMENT DESCRIPTION:

MODIFICATION OF A GASOLINE DISPENSING OPERATION WITH ONE 2,000 GALLON CONVAULT ABOVEGROUND STORAGE TANK SERVED BY TWO-POINT PHASE I VAPOR RECOVERY SYSTEM (G-70-97), AND 1 FUELING POINT WITH 1 GASOLINE DISPENSING NOZZLE SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-116-B): UPGRADE PHASE I VAPOR RECOVERY SYSTEM FROM TWO-POINT TO MORRISON BROTHERS EVR (VR-402-B)

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. The Phase I, Phase II, and Standing Loss Control Vapor recovery systems shall be installed and maintained in accordance with the manufacturer specifications and the ARB Executive Orders specified in this permit, including applicable rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board that have been made conditions of the certification. [District Rules 4621 and 4622 and CH&SC 41950] Federally Enforceable Through Title V Permit
3. This gasoline storage and dispensing equipment shall not be used in retail sales, where gasoline dispensed by the unit is subject to payment of California sales tax on gasoline sales. [District Rule 4622] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The storage container(s) shall be installed, maintained, and operated such that they are leak-free. [District Rule 4621] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Martin Keast for

DAVID WARNER, Director of Permit Services

N-811-13-5; Apr 1 2014 5:03PM - A9MADS : Joint Inspection NOT Required

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475

6. The Phase I and Phase II vapor recovery systems and gasoline dispensing equipment shall be maintained without leaks as determined in accordance with the test method specified in this permit. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
7. A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration of total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with EPA Test Method 21. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
8. No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo container, which attest to the vapor integrity of the container. [District Rule 4621] Federally Enforceable Through Title V Permit
9. No person shall operate any ARB certified Phase II vapor recovery system or any portion thereof that has a major defect or an equipment defect that is identified in any applicable ARB Executive Order until the following conditions have been met: 1) the defect has been repaired, replaced, or adjusted as necessary to correct the defect; 2) the District has been notified, and the District has reinspected the system or authorized the system for use (such authorization shall not include the authority to operate the equipment prior to the correction of the defective components); and 3) all major defects, after repair, are duly entered into the Operations and Maintenance (O&M) manual. [District Rule 4622] Federally Enforceable Through Title V Permit
10. Upon identification of any major defects, the permittee shall tag "Out-of-Order" all dispensing equipment for which vapor recovery has been impaired. Tagged equipment shall be rendered inoperable and the tag(s) shall not be removed until the defective equipment has been repaired, replaced, or adjusted, as necessary. In the case of defects identified by the District, tagged equipment shall be rendered inoperable, and the tag shall not be removed until the District has been notified of the repairs, and the District has either reinspected the system or authorized the tagged equipment for use. [District Rule 4622] Federally Enforceable Through Title V Permit
11. The permittee shall implement a periodic maintenance inspection program for the certified Phase II vapor recovery system consistent with the requirements of this permit. The program shall be documented in an operation and maintenance (O&M) manual and shall at a minimum contain the following information: 1) copies of all vapor recovery performance tests; 2) all applicable ARB Executive Orders, Approval Letters, and District Permits; 3) the manufacturer's specifications and instructions for installation, operation, repair, and maintenance required pursuant to ARB Certification Procedure CP-201, and any additional instruction provided by the manufacturer; 4) system and/or component testing requirements, including test schedules and passing criteria for each of the standard tests required by this permit (the owner/operator may include any non-ARB required diagnostic and other tests as part of the testing requirements), and 5) additional O&M instructions, if any, that are designed to ensure compliance with the applicable rules, regulations, ARB Executive Orders, and District permit conditions, including replacement schedules for failure or wear prone components. [District Rule 4622] Federally Enforceable Through Title V Permit
12. The permittee shall conduct periodic maintenance inspections based on the greatest monthly throughput of gasoline dispensed by the facility in the previous year as follows: A) less than 2,500 gallons - one day per month; B) 2,500 to less than 25,000 gallons - one day per week; or C) 25,000 gallons or greater - five days per week. All inspections shall be documented within the O & M Manual. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
13. Periodic maintenance inspections of the Phase I vapor recovery system shall include, at a minimum, verification that 1) the fill caps and vapor caps are not missing, damaged, or loose; 2) the fill cap gasket and vapor cap gaskets are not missing or damaged; 3) the fill adapter and vapor adapter are securely attached to the risers; 4) where applicable, the spring-loaded submerged fill tube seals properly against the coaxial tubing; 5) the dry break (poppet-valve) is not missing or damaged; and 6) the submerged fill tube is not missing or damaged. [District Rule 4621] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

14. Periodic maintenance inspections of the Phase II vapor recovery system shall include, at a minimum, verification that 1) the following nozzle components are in place and in good condition as specified in ARB Executive Order as applicable: faceplate/facecone, bellows, latching device spring, vapor check valve, spout (proper diameter/vapor collection holes), insertion interlock mechanism, automatic shut-off mechanism, and hold open latch (unless prohibited by law or the local fire control authority); 2) the hoses are not torn, flattened or crimped; 3) the vapor path of the coaxial hoses associated with bellows equipped nozzles does not contain more than 100 ml of liquid if applicable; and 4) the vapor processing unit is functioning properly, for operations that are required to have or possess such a unit. [District Rule 4622] Federally Enforceable Through Title V Permit
15. In the event of a separation due to a drive off, the permittee shall, unless otherwise specified in the applicable ARB Executive Order, conduct a visual inspection of the affected equipment and either 1) perform qualified repairs on any damaged components and conduct applicable re-verification tests pursuant to the requirements of this permit, or 2) replace the affected nozzles, coaxial hoses, breakaway couplings, and any other damaged components with new or certified rebuilt components that are ARB certified. The activities shall be documented in accordance with the requirements of this permit before placing the affected equipment back in service. [District Rule 4622] Federally Enforceable Through Title V Permit
16. The gasoline throughput for this permit unit shall not exceed 657,000 gallons in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The permittee shall conduct all periodic vapor recovery system performance tests specified in this permit, no more than 30 days before or after the required compliance testing date, unless otherwise required under the applicable ARB Executive Order. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
18. The permittee shall perform and pass a Static Leak Test "Determination of Static Pressure Performance of Vapor Recovery Systems at Gasoline Dispensing Facilities with Aboveground Tanks" in accordance with the Executive Order specified in this permit for the Phase I Vapor Recovery System within 60 days after initial start-up and at least once every 12 months thereafter. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
19. For certified Phase II vapor recovery systems with liquid removal devices, the permittee shall perform and pass an ARB TP-201.6C Liquid Removal Test whenever the liquid in the vapor path exceeds 100 ml of liquid, or as required by the applicable ARB Executive Order. The amount of liquid in the vapor path shall be measured by lowering the gasoline dispensing nozzle into a container until such time that no more liquid drains from the nozzle. The amount of liquid drained into the container shall be measured using a graduated cylinder or graduated beaker. The vapor path shall be inspected according to the monitoring frequency as determined by monthly gasoline throughput. [District Rule 4622] Federally Enforceable Through Title V Permit
20. A person conducting testing of, or repairs to, a certified vapor recovery system shall be in compliance with District Rule 1177 (Gasoline Dispensing Facility Tester Certification). [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
21. A person performing installation of, or maintenance on, a certified Phase I or Phase II vapor recovery system shall be certified by the ICC for Vapor Recovery System Installation and Repair, or work under the direct and personal supervision of an individual physically present at the work site who is certified. The ICC certification shall be renewed every 24 months. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
22. Proof of the ICC certification and all other certifications required by the Executive Order and installation and operation manual shall be made available onsite. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
23. The permittee shall notify the District at least 7 days prior to each performance test. The test results shall be submitted to the District no later than 30 days after the completion of each test. [District Rule 4621] Federally Enforceable Through Title V Permit
24. The permittee shall maintain a copy of all test results. The test results shall be dated and shall contain the name, address, and telephone number of the company responsible for system installation and testing. [District Rule 4622] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

25. The permittee shall maintain on the premises a log of any repairs made to the certified Phase I or Phase II vapor recovery system. The repair log shall include the following: 1) date and time of each repair; 2) the name and applicable certification numbers of the person(s) who performed the repair, and if applicable, the name, address and phone number of the person's employer; 3) description of service performed; 4) each component that was repaired, serviced, or removed; 5) each component that was installed as replacement, if applicable; and 6) receipts or other documents for parts used in the repair and, if applicable, work orders which shall include the name and signature of the person responsible for performing the repairs. [District Rule 4622] Federally Enforceable Through Title V Permit
26. The O&M manual shall be kept at the dispensing operation and made available to any person who operates, inspects, maintains, repairs, or tests the equipment at the operation as well as to District personnel upon request. [District Rule 4622] Federally Enforceable Through Title V Permit
27. The permittee shall maintain monthly and annual gasoline throughput records. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
28. All records required by this permit shall be retained on-site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
29. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4621 (as amended December 19, 2013). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

Appendix III

Permit to Operate N-811-13-4

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-811-13-4

EXPIRATION DATE: 11/30/2018

EQUIPMENT DESCRIPTION:

ONE (1) 2,000 GALLON ABOVE GROUND CONVAULT GASOLINE STORAGE TANK SERVED BY COAXIAL PHASE I VAPOR RECOVERY SYSTEM (G-70-97) AND ONE (1) NOZZLE SERVED BY OPW BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-116-B)

PERMIT UNIT REQUIREMENTS

1. The operator shall not store gasoline in or otherwise use or operate any gasoline delivery vessel unless such vessel is designed and maintained to be vapor tight. Any delivery vessel into which gasoline vapors have been transferred shall be filled only at a loading facility that is equipped with a certified system that prevents at least 95% by weight of the gasoline vapors displaced from entering the atmosphere. [District NSR Rule and 4621, 5.2.2] Federally Enforceable Through Title V Permit
2. Any open vent pipe on a stationary aboveground gasoline storage tank shall be equipped with a certified pressure-vacuum relief valve set at eight ounces per square inch, unless otherwise specified in the applicable CARB executive order, and provided that such setting will not exceed the vessel's maximum pressure rating. The vent pipes may be manifolded, as per the applicable CARB executive order, to a single pressure-vacuum relief valve meeting the aforementioned specifications. [District NSR Rule and 4621, 5.1.2] Federally Enforceable Through Title V Permit
3. The vapor recovery systems and their components shall be installed, operated, and maintained in accordance with the State certification requirements. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The District shall be notified by the permittee 15 days prior to each test. The test results shall be submitted to the District no later than 30 days after each test. [District NSR Rule and District Rule 4622] Federally Enforceable Through Title V Permit
5. This gasoline storage and dispensing equipment shall not be used in retail sales, where gasoline dispensed by the unit is subject to payment of California sales tax on gasoline sales. [District Rule 2520, 9.1] Federally Enforceable Through Title V Permit
6. To ensure that all components of the certified Phase II vapor recovery system are maintained in proper operating condition, the non-retail service station operator shall conduct a maintenance inspection one day per month. [District Rule 4622, 5.4.2] Federally Enforceable Through Title V Permit
7. The operator shall maintain all records of required monitoring data, facility monthly gasoline throughput, and support information for District inspection for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Loading and vapor collection equipment shall be maintained and operated such that there are no liquid component leaks under any conditions, nor any excess organic liquid drainage at disconnect. [District Rule 4621, 5.0] Federally Enforceable Through Title V Permit
9. The operator shall not transfer or permit the transfer of gasoline from any delivery vessel into any stationary storage container unless such container is equipped with a permanent submerged fill pipe and a certified Phase I vapor recovery system which is maintained and operated according to the manufacturers specifications. [District Rule 4621, 5.1.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo tank, which attest to the vapor integrity of the tank. [District Rule 4621, 5.2.1] Federally Enforceable Through Title V Permit
11. The hatch on a delivery vessel shall not be opened for visual inspection unless at least three minutes have elapsed since loading or unloading has stopped. The dome hatch, once opened, shall not be held open longer than three minutes. [District Rule 4621, 5.2.3] Federally Enforceable Through Title V Permit
12. Gasoline vapors from this unit shall not be purged into the atmosphere. [District Rule 4621, 5.2.4] Federally Enforceable Through Title V Permit
13. The vapor recovery system shall not create a backpressure in excess of the pressure limits of the delivery vessel certification leak test (18 inches water column). [District Rule 4621, 5.2.5] Federally Enforceable Through Title V Permit
14. The Reid Vapor Pressure of gasoline stored at this facility shall be determined in accordance with ASTM D 5191. [District Rule 4621, 6.2.1 and 4622, 6.3.3] Federally Enforceable Through Title V Permit
15. When determining vapor leaks with a portable analyzer the following must occur: 1) The probe inlet shall be 2.5 cm from the potential leak source. 2) The probe shall be moved slowly (approximately 4 cm/sec). If there is any meter deflection at the potential leak source, the probe shall be moved to locate the point of highest meter response. 3) To the greatest extent possible, the probe inlet shall be positioned in the path of the vapor flow from a leak so as to maximize the measured concentration. 4) The detector response time must be equal to or less than 30 seconds and the detector shall not probe any potential leak source for longer than twice the detector response time. 5) As an alternative to the preceding procedures, operators may use the soap bubble method described in the Alternative Screening Procedure in EPA Method 21. [District Rule 4621, 6.2.2] Federally Enforceable Through Title V Permit
16. The test method to determine vapor tightness of delivery vessels and storage tanks shall be EPA Method 21. [District Rule 4621, 6.2.3 and District Rule 4622, 6.3.4] Federally Enforceable Through Title V Permit
17. The operator shall not transfer or permit the transfer of gasoline from a stationary storage container into a motor vehicle fuel tank with a capacity of greater than five (5) gallons unless the gasoline dispensing unit used to transfer the gasoline from the stationary storage container to the motor vehicle fuel tank is equipped with and has in operation a certified Phase II vapor recovery system. [District Rule 4622, 5.1] Federally Enforceable Through Title V Permit
18. The operator of this gasoline dispensing facility, which has installed a permitted certified Phase II vapor recovery system, shall continue to use such system and shall maintain the system and all of its components in good repair in order that such system can continue to comply with the certification recovery efficiency. Any certified Phase II vapor recovery system that has been installed shall not be removed regardless of the amount of gasoline dispensed or how the gasoline is delivered to the facility. [District Rule 4622, 5.3] Federally Enforceable Through Title V Permit
19. The owner/operator of a gasoline dispensing facility shall implement a periodic maintenance inspection program and document the program in an operation and maintenance (O&M) manual for the certified Phase II vapor recovery system. The O&M manual shall be kept at the facility and made available to any person who operates, inspects, maintains, repairs, or tests the equipment at the facility as well as to the District personnel upon request. The O&M manual shall contain detailed instructions that ensure proper operation and maintenance of the certified Phase II vapor recovery system and its components in compliance with all applicable rules and regulations. The manual shall, at a minimum, include the following current information: 1) All applicable ARB Executive Orders, Approval Letters, and District Permits. 2) The manufacturer's specifications and instructions for installation, operation, repair, and maintenance required pursuant to ARB Certification Procedure CP-201, and any additional instruction provided by the manufacturer. 3) System and/or component testing requirements, including test schedules and passing criteria for each of the standard tests listed in Section 6.0. The owner/operator may include any non-ARB required diagnostic and other tests as part of the testing requirements. 4) Protocol for performing periodic maintenance inspections including the components to be inspected and the defects requiring repair. 5) Additional O&M instructions, if any, that are designed to ensure compliance with the applicable rules, regulations, ARB Executive Orders, and District permit conditions, including replacement schedules for failure or wear prone components. [District Rule 4622, 5.4.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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20. Any equipment with a major defect, which is identified during the periodic maintenance inspections, shall be removed from service and, when repaired, duly entered into the O&M manual. The person conducting the inspections shall, at a minimum, verify the following during inspections: 1) That the fueling instructions are clearly displayed with the appropriate toll-free complaint phone number and toxic warning signs. 2) That the following nozzle components are in place and in good condition as specified in ARB Executive Orders: faceplate/facecone, bellows, latching device spring, vapor check valve, spout (proper diameter/vapor collection holes), insertion interlock mechanism, automatic shut-off mechanism, hold open latch. 3) That the hoses are not torn, flattened or crimped. 4) That the vapor path does not contain more than 100 ml of liquid and that the vapor path shall be inspected at least once per calendar month. 5) That the vapor-processing unit is functioning properly. 6) Phase I vapor recovery system components that are functionally part of the Phase II vapor recovery system shall be inspected. The person conducting this inspection shall, at a minimum, verify the following: 1) That the fill caps and vapor caps are not missing, damaged, or loose. 2) That the fill cap gasket and vapor cap gaskets are not missing or damaged. 3) That the fill adapter and vapor adapter are securely attached to the risers. 4) That, where applicable, the spring-loaded submerged fill tube seals properly against the coaxial tubing, and the dry break (poppet-valve) is not missing or damaged. 5) That the submerged fill tube is not missing or damaged. [District Rule 4622, 5.4.3] Federally Enforceable Through Title V Permit
21. The operator shall not operate any certified Phase II vapor recovery system or any portion thereof that has a defect listed in Section 94006 of Title 17 of the California Code of Regulations, or an equipment defect that is identified in any applicable ARB Executive Order, until the defect has been repaired, replaced, or adjusted as necessary to correct the defect, and the District has reinspected the system or has authorized its use pending reinspection. Such authorization shall not include the authority to operate the equipment prior to the correction of the defective components. [District Rule 4622, 5.5] Federally Enforceable Through Title V Permit
22. The operator, upon identification of any of the defects described in the previous permit condition, shall tag "Out-of-Order" all dispensing equipment for which vapor recovery has been impaired. The tagged equipment shall be rendered inoperable and the tag(s) shall not be removed until the defective equipment has been repaired, replaced, or adjusted, as necessary. In the case of defects identified by the District, tagged equipment shall be rendered inoperable, and the tag shall not be removed until the District has been notified of the repairs, and/or the District has inspected and authorized the tagged equipment for use. [District Rule 4622, 5.6] Federally Enforceable Through Title V Permit
23. All certified Phase II vapor recovery systems and gasoline dispensing equipment shall be maintained to have no leaks. [District Rule 4622, 5.7] Federally Enforceable Through Title V Permit
24. No person shall top off a motor vehicle fuel tank. [District Rule 4622, 5.9] Federally Enforceable Through Title V Permit
25. The operator shall not tamper with, or permit tampering with, the system in a manner that would impair the operation or effectiveness of the certified Phase II vapor recovery system. [District Rule 4622, 5.11] Federally Enforceable Through Title V Permit
26. All liquid removal devices required by ARB Executive Order shall be maintained to achieve a minimum liquid removal rate of five milliliters per gallon. This standard shall apply at dispensing rates exceeding five gallons per minute, unless a higher removal rate is specified in the applicable Executive Order. [District Rule 4622, 5.12] Federally Enforceable Through Title V Permit
27. Verification must be provided that the certified Phase II vapor recovery system shall meet or exceed the requirements of the tests required of this Permit to Operate. These test results shall be dated and shall contain the names, addresses, and telephone numbers of the companies responsible for system installation and testing. [District Rule 4622, 6.1.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

28. A person who performs repairs on any certified Phase I or Phase II vapor recovery system shall provide to the operator a repair log, which the operator shall maintain on the premises and which shall include all of the following; 1) Date and time of each repair. 2) The name of the person(s) who performed the repair, and, if applicable, the name, address and phone number of the person's employer. 3) Description of service performed. 4) Each component that was repaired, serviced, or removed. 5) Each component that was installed as replacement, if applicable. 6) Receipts or other documents for parts used in the repair and, if applicable, work orders which shall include the name and signature of the person responsible for performing the repairs. [District Rule 4622, 6.1.4] Federally Enforceable Through Title V Permit
29. An operator shall comply with the following certified Phase II vapor recovery system performance verification requirements. 1) The operator shall conduct a Static Leak Test of the certified Phase II vapor recovery system at least once every twelve months. 2) The operator shall conduct a Dynamic Back-Pressure Test of the certified Phase II vapor recovery system at least once every twelve months. 3) For certified Phase II vapor recovery systems with bellows-less nozzles, the operator shall conduct an Air-to-Liquid Volume Ratio Test at least once every six months. 4) For certified Phase II vapor recovery systems with a liquid removal device required by ARB Executive Orders, the operator shall conduct a Liquid Removal Test whenever the liquid in the vapor path exceeds 100 ml of liquid. The amount of liquid in the vapor path shall be determined by lowering the gasoline dispensing nozzle into a container until such time that no more liquid drains from the nozzle. The amount of liquid drained into the container shall be measured using a graduated cylinder or graduated beaker. [District Rule 4622, 6.2.1] Federally Enforceable Through Title V Permit
30. The operator shall require that the person responsible for the Phase II vapor recovery system performance tests shall use calibrated equipment meeting the calibration range and calibration intervals specified by the manufacturer. This person shall also have completed a District-approved training program or the District's orientation class for testing and any subsequent required refresher class(es). [District Rule 4622, 6.2.2 and 6.2.3] Federally Enforceable Through Title V Permit
31. The operator shall notify the District at least 15 days prior to any compliance testing required of this PTO. [District Rule 4622, 6.2.4] Federally Enforceable Through Title V Permit
32. Each certified Phase II vapor recovery system shall be tested within 60 days of completion of installation or major modification. [District Rule 4622, 6.2.5] Federally Enforceable Through Title V Permit
33. All tests shall be conducted in accordance with the latest version of the following ARB approved test methods, or their equivalents as approved by the U.S. Environmental Protection Agency (EPA), ARB, and the APCO; 1) Static Leak Test for Aboveground Tanks, ARB TP-201.3B. 2) Dynamic Back-Pressure Test, ARB TP-201.4. 3) Air-to-Liquid Volume Ratio Test, ARB TP-201.5. 4) Liquid Removal Test, ARB TP-201.6 [District Rule 4622, 6.3.1] Federally Enforceable Through Title V Permit
34. For those vapor recovery systems whose ARB Executive Orders specify different tests to be performed instead of, or in addition to, the referenced test methods, or which, by their design, preclude the use of the referenced test methods, shall be tested in accordance with the test procedures specified in the applicable ARB Executive Orders or their equivalents as approved by the APCO, ARB, and EPA. [District Rule 4622, 6.3.2] Federally Enforceable Through Title V Permit
35. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4621 (as amended December 12, 2007). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Appendix IV

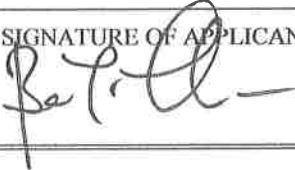
Permit Application

San Joaquin Valley Air Pollution Control District


www.valleyair.org

Permit Application For:

[] ADMINISTRATIVE AMENDMENT [x] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>City of Stockton -MUD</u>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>2500 Navy Dr.</u> CITY: <u>Stockton</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95206</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>2500 Navy Dr.</u> CITY: <u>Stockton</u> ____ ¼ SECTION ____ TOWNSHIP ____ RANGE ____	INSTALLATION DATE: <u>5/29/2014</u>
4. GENERAL NATURE OF BUSINESS:	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>Phase I EVR upgrade on gasoline AST Permit # N-811-13-5</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>FRC Mel Lytle Ph.D.</u>	TITLE OF APPLICANT: <u>Director Municipal Utilities</u>
7. SIGNATURE OF APPLICANT: 	DATE: <u>8/15/2014</u> PHONE: (209) 937-8700 FAX: () EMAIL:

For APCD Use Only:

DATE STAMP  <u>AUG 19 2014</u> SJVAPCD NORTHERN REGION	FILING FEE RECEIVED: \$ <u>0</u> CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>N1142973</u> FACILITY ID: <u>N-811</u>
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San Joaquin Valley
Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- ☐ SIGNIFICANT PERMIT MODIFICATION ☐ ADMINISTRATIVE
☒ MINOR PERMIT MODIFICATION ☐ AMENDMENT

COMPANY NAME: City of Stockton - MUD	FACILITY ID: N- 811
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input checked="" type="checkbox"/> Utility	
2. Owner's Name: City of Stockton-MUD	
3. Agent to the Owner: C. Mel Lytle Ph.D.	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- BT** Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- BT** Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- BT** Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- BT** Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

C. Mel Lytle / Deputy Director
Signature of Responsible Official

Aug. 15, 2014
Date

for C. Mel Lytle Ph.D.

Name of Responsible Official (please print)

Director Municipal Utilities

Title of Responsible Official (please print)

Appendix V

Emissions Change

Emissions Change:

The proposed modification, to upgrade the phase I vapor recovery system from two-point to Morrison Brothers EVR results a decrease of potential emissions from the subject unit.

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
N-811-13-6	0	-165	0	0	0
TOTAL:	0	-165	0	0	0